

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BONGO PRODUCTIONS, LLC, ROBERT
BERNSTEIN, SANCTUARY PERFORMING
ARTS LLC, and KYE SAYERS,

Plaintiffs,

v.

CARTER LAWRENCE, Tennessee State Fire
Marshal, in his official capacity,
CHRISTOPHER BAINBRIDGE, Director of
Codes Enforcement, in his official capacity,
GLENN R. FUNK, District Attorney General
for the 20th Judicial District, in his official
capacity, and NEAL PINKSTON, District
Attorney General for 11th Judicial District, in
his official capacity,

Defendants.

Civ. Action
No. 3:21-cv-00490
Judge Trauger

DECLARATION OF THOMAS H. CASTELLI

1. I am one of the attorneys for Plaintiffs Bongo Productions, LLC, Robert Bernstein, Sanctuary Performing Arts LLC, and Kye Sayers.

2. I submit this declaration to provide copies of materials referenced in the memorandum of law in support of Plaintiffs' motion for preliminary injunction that are not readily available online. All other materials referenced in Plaintiffs' memorandum of law are available in reporters or other legal databases, or include a URL in the citation for ease of access.

3. A true and accurate copy of Joshua D. Safer & Vin Tangpricha, *Care of the Transgender Patient*, 171 Annals of Internal Med. 171:ITC1 (July 2, 2019) is attached as Exhibit A.

4. A true and accurate copy of Katrina Kazarkis, *The Misuses of 'Biological Sex,'* The Lancet 1898 (Nov. 23, 2019) is attached as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2021

/s/ Thomas H. Castelli
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